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Attorney for Plaintiff.

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF THE NORTHERN MARIANA ISLANDS

SAIPAN HANDICRAFT,]	Civil Action No. 05-0040
]	
Plaintiff,]	DECLARATION OF PLAINTIFF’S
vs.]	COUNSEL IN SUPPORT OF
]	APPLICATION FOR ENTRY OF
MICRONESIA WOODCRAFT ENT., INC.,]	DEFAULT JUDGMENT AGAINST
et al.,]	PACIFIC INT’L. CORPORATION
]	dba MARIANAS WOODCRAFT
]	
Defendants.]	
]	

I, F. Matthew Smith, hereby depose and say:

1. I am a duly licensed attorney and I am admitted to practice before all courts of the CNMI;
2. I am counsel for Plaintiff Saipan Handicraft in this matter;
3. That on April 18, 2006, I caused to be filed Plaintiff’s First Amended Verified Complaint naming Defendant Pacific Int’l. Corporation dba Marianas Woodcraft as a party in this matter;
4. That on April 25, 2006, at my direction, a Summons and a copy of Plaintiff’s First Amended Verified Complaint was served on Defendant Pacific Int’l. Corporation dba Marianas Woodcraft by personally delivering the documents to Jess Pantaleon, managing agent for Pacific International Corporation dba Marianas Woodcraft;

EXHIBIT “A”

5. That on April 26, 2006, at my direction, a Proof of Service on Defendant Pacific Int'l. Corporation dba Marianas Woodcraft was filed with the Court;

6. That from the date of service of the Summons and a copy of Plaintiff's First Amended Verified Complaint to present, Defendant Pacific Int'l. Corporation dba Marianas Woodcraft has failed to file a responsive pleading or otherwise defend the suit;

7. That more than twenty (20) days have elapsed since Defendant was served with the Summons and a copy of Plaintiff's First Amended Verified Complaint; and

8. That to my knowledge the Clerk of Court has not received any Answer, responsive pleading or other communication from Defendant in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true, correct, and to the best of my knowledge.

Affiant sayeth naught.

Executed this 6th day of July, 2006, Saipan, the Commonwealth of the Northern Mariana Islands.

/s/ F. Matthew Smith

F. MATTHEW SMITH
Attorney for Plaintiff